

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DAVID SCOTT, JEREMY CERDA, OSMAN
AK, MERUDH PATEL, GREGORY HARDY,
and LARRY WILLIAMS,

individually and on behalf of all others similarly
situated,

Plaintiffs,

-against-

FORMER WARDEN HERMAN E. QUAY,
FACILITIES MANAGER JOHN MAFFEO, and
THE UNITED STATES OF AMERICA,

Defendants.

No. 19 Civ. 1075

**PLAINTIFFS' FIRST
CONSOLIDATED SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
OF DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiffs request that Defendants Former Warden Herman E. Quay, Facilities Manager John Maffeo, and the United States of America (collectively, the “Defendants”) answer the following interrogatories, within thirty days. Please take further notice that, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs request that Defendants produce for copying and inspection at the office of Emery Celli Brinckerhoff & Abady LLP, 600 Fifth Avenue, 10th Floor, New York, New York 10020, within thirty days, all documents and materials described herein.

DEFINITIONS

Plaintiffs hereby incorporate the Uniform Definitions in Discovery Requests contained in Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York in addition to the following definitions:

1. Defendants: The term “Defendants” means all defendants named in the case caption, above.

39. All communications between BOP and/or MDC employees and public or elected officials during the Conditions Crisis, including but not limited to Mayor Bill DeBlasio, and Congresspersons Vasquez and Nadler.

40. All contracts between the BOP and/or MDC and engineering companies or firms in force between January 1, 2019 and the present concerning work at the MDC.

41. All contracts between the BOP and/or MDC and electrical, heating, and/or HVAC companies or firms in force between January 1, 2019 and the present concerning work at the MDC.

42. All incident reports arising out of events that took place during the Conditions Crisis.

43. All requests from people detained in the MDC, including “cop-outs” and hand-written requests, created during the Conditions Crisis.

44. All documents concerning requests for medical assistance, medication, and/or refills of medication submitted by people detained at the MDC during the Conditions Crisis, including hand-written requests from and MDC employee notes concerning verbal requests.

45. All documents concerning any investigation of the Conditions Crisis, including investigator notes, witness statements and recordings, and documents provided to investigators.

46. All documents and communications concerning training for staff at the MDC regarding emergencies or disasters.

47. All Employee Performance Appraisals, performance evaluations, or performance reviews completed for Defendants Quay and Maffeo, and any documents related to those reviews.